

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: JUAN G MORALES  
LETICIA MORALES

) Case No. 16 B 03644  
)  
Debtors ) Chapter 13  
)  
) Judge: DONALD R CASSLING

**NOTICE OF MOTION**

JUAN G MORALES  
LETICIA MORALES  
3943 W 64TH ST  
CHICAGO, IL 60629

SULAIMAN LAW GROUP LTD  
via Clerk's ECF noticing procedures

Please take notice that on May 09, 2019 at 9:30 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on April 05, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR TERM OF PLAN**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On February 06, 2016 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan was confirmed on March 24, 2016, for a period of 60 months.
3. The plan will complete in 67 months, from the date of confirmation .

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to § 1322 (d) and § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn